

**Congress of the United States**  
**Washington, DC 20515**

May 14, 2019

284

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission 445  
12th Street, S.W.  
Washington, DC 20554

Dear Chairman Pai:

We are writing to you regarding the Federal Communications Commission's ongoing review of its fixed and wireless broadband availability maps. As the Commission contemplates future Universal Service Fund (USF) support mechanisms that could directly affect broadband deployment in unserved and underserved areas in Michigan, we urge you to carefully address the Commission's broadband availability maps.

The Commission's broadband availability maps are based largely upon whatever information may be received from providers through its Form 477 survey data collection. Although the FCC's database may represent the most consistent data collection mechanism and provide a complete repository of such information available today, there are several problems with the current maps. Specifically, the maps are not granular enough; in the context of fixed broadband, an entire census block will appear as served even if service is offered to only one location within that census block. This can result in denial of USF funding in such areas, leaving many locations without essential broadband service simply because they share a census block with a household considered as served. We are additionally concerned that the provider-originated reports used to compose these maps are largely *unvalidated*. The providers must certify the accuracy of their submitted reports, but the information verification processes used before funding or financing determinations are made can significantly vary—or, in many cases, such processes do not exist at all. Furthermore, these processes can be very costly and expensive, especially for smaller providers who are most likely to benefit from more granular maps. If funding or financing decisions flow directly from the maps, we must ensure they are sufficiently accurate, granular, and up to date.





We are writing to ask the FCC to continue to take steps to address these concerns. First, it is critical that the FCC to develop a more granular and standardized reporting process to demonstrate broadband availability—while also balancing the burdens of reporting, especially for smaller providers. It is additionally important to ensure separately and distinctly the accuracy of that more granular data, including data held by interagency partners at the National Telecommunications and Information Administration or the U.S. Department of Agriculture. As the Mobility Fund experience indicated, reliance only upon self-reported data has presented challenges for the agency, and flawed data has directly impacted the ability of rural broadband

providers to deploy service to new areas. We therefore encourage the FCC to establish a robust and meaningful challenge process that will enable better validation of both fixed and mobile data *prior* to relying upon such data in making funding or financing decisions, and working with other Federal agencies to coordinate such efforts.

Access to affordable, reliable broadband is critical for the business, educational, health care, and other daily needs of Michiganders. Our constituents should not be left behind in the 21<sup>st</sup> century digital economy due to flawed broadband availability maps. Thus, it is critical to ensure inaccurate information will not result in a denial of access to fixed or mobile broadband support. A validated set of data based upon standardized methods of granular reporting will help better achieve universal service.

Thank you for your attention to this issue. I look forward to working with you as the FCC continues working to ensure all Americans have access to robust, reliable, and affordable broadband.

Sincerely,

  
Tim Walberg  
Member of Congress  
Jack Bergman  
Member of Congress  
Paul Mitchell  
Member of Congress  
John R. Moolenaar  
Member of Congress  
Bill Huizenga  
Member of Congress  
Elissa Slotkin  
Member of Congress

cc: The Honorable Michael O'Rielly  
Commissioner, Federal Communications Commission

The Honorable Brendan Carr  
Commissioner, Federal Communications Commission

Letter to Chairman Pai  
Page 3

The Honorable Jessica Rosenworcel  
Commissioner, Federal Communications Commission

The Honorable Geoffrey Starks  
Commissioner, Federal Communications Commission



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Tim Walberg  
U.S. House of Representatives  
2266 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Walberg:

Thank you for your letter regarding broadband mapping. Closing the digital divide is my top priority. I have seen for myself in 45 states, including Michigan, and the territories of Puerto Rico and the Virgin Islands what affordable high-speed Internet access can do for a community—for its families, its schools, its hospitals, its farms, its businesses—as well as the impact of its absence.

I agree that using updated and accurate broadband deployment data is critical to bridging the digital divide. We need to understand where broadband is available and where it is not to target our efforts and direct funding to areas that are most in needed. That is why the Commission two basic reforms to the collection of broadband data when I came into office. First, we initiated a new data collection for mobile broadband coverage as part of Phase II of the Mobility fund (which included a robust challenge process). Second, we began a top-to-bottom review of the Form 477 process to ensure that broadband data was more accurate, granular, and ultimately useful to the Commission and the public.

In your letter, you ask the Commission seriously consider verifications mechanisms, specifically a challenge process to improve the validation of data submitted to broadband availability databases. I believe a public feedback mechanism could improve the Commission's broadband coverage maps and Form 477 data. Indeed, as you may know, the Commission's Speed Test App is one way that consumers can currently participate in collecting data about broadband deployment, and it has proven to be a useful tool for assessing service availability. I've asked Commission staff to look into other ways to collect and use accurate data from many sources—including consumers themselves—to assemble a more reliable map. We are interested in developing methods for the submission of reliable, consumer-driven data to better inform the Commission's decision making in this area. We would be happy to receive any input you or your staff might have on how to establish and implement such methods.

I appreciate your interest in this matter. Your views are very important and will be entered into the record of the proceeding and considered as part of the Commission's review. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai".

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Jack Bergman  
U.S. House of Representatives  
414 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Bergman:

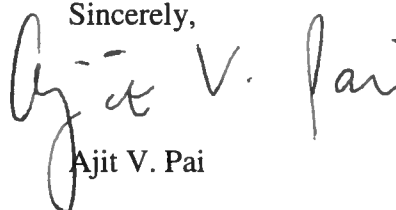
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Ajit V. Pai





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WASHINGTON

OFFICE OF  
THE CHAIRMAN

May 23, 2019

The Honorable Paul Mitchell  
U.S. House of Representatives  
211 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Mitchell:

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OFFICE OF  
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May 23, 2019

The Honorable John Moolenaar  
U.S. House of Representatives  
117 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Moolenaar:

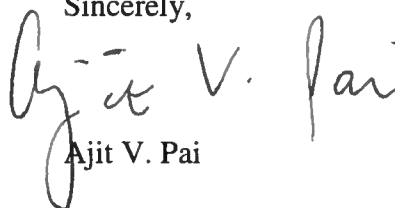
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May 23, 2019

The Honorable Bill Huizenga  
U.S. House of Representatives  
2232 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Huizenga:

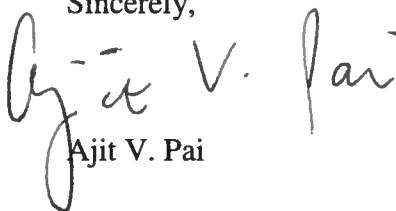
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May 23, 2019

The Honorable Elissa Slotkin  
U.S. House of Representatives  
1531 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Slotkin:

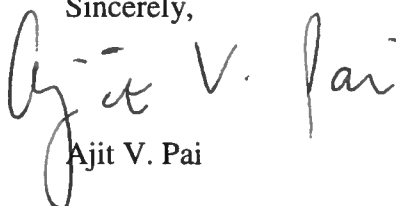
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